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Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

# UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11

PURDUE PHARMA L.P., et al.,

Case No. 19-23649 (RDD)

Debtors. (Jointly Administered)

FORTY-FIFTH MONTHLY FEE STATEMENT OF GILBERT LLP, FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION CLAIMANTS FOR THE PERIOD JUNE 1, 2023 THROUGH JUNE 30, 2023

The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant:	Gilbert LLP
Authorized to provide professional services	Ad Hoc Committee of Governmental and Other
to:	Contingent Litigation Claimants
<b>Date of Order Approving Debtors' Payment</b>	December 2, 2019 (Docket #553)
of Fees and Expenses of Applicant:	
Period for which compensation and	June 1, 2023 through June 30, 2023
reimbursement is sought:	-
Amount of compensation sought as actual,	\$163,608.00 (80% of \$204,510.00)
reasonable, and necessary:	·
Amount of expense reimbursement sought	\$1,652.00 (100%)
as actual, reasonable and necessary:	
This is a:	Monthly Fee Statement

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals entered by this Court on December 2, 2019 [Docket #553] (the "Reimbursement Order"), and the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals [Docket #529] (the "Procedures Order"), the law firm of Gilbert LLP ("Gilbert LLP"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the "AHC"), hereby submits this forty-fifth monthly fee statement (the "Monthly Fee Statement") for legal services rendered and reimbursement for expenses incurred for the period commencing June 1, 2023 through June 30, 2023 (the "Application Period").

## **Itemization of Services Rendered and Expenses Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$204,510.00 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$163,608.00.

- 2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$1,108.51. The blended hourly rate of paraprofessionals during the Application Period is \$225.00.
- 3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$1,652.00 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$1,652.00.
- 4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

#### **FILING AND SERVICE**

- 5. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.
- 6. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

19-23649-shl Doc 5814 Filed 08/10/23 Entered 08/10/23 14:50:40 Main Document Pg 4 of 21

7. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$163,608.00 (80% of \$204,510.00) and reimbursement of reasonable and necessary expenses incurred in the amount of \$1,652.00 (100%), for a total amount of \$165,260.00 for the Application Period.

Dated: August 10, 2023 Washington, DC

Respectfully submitted,

#### **GILBERT LLP**

/s/ Kami E. Quinn

Kami E. Quinn 700 Pennsylvania Avenue, SE Suite 400 Washington, DC 20003

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Counsel for the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants.

# Exhibit A Summary of Services by Category

# SUMMARY OF SERVICES BY PROJECT CATEGORY

Project Code	Project Category	Hours Billed in Period	Fees for Period
A004	Case Administration	3.4	\$765.00
A008	Hearings	0.5	\$500.00
A009	Meetings / Communications with AHC & Creditors	7.2	\$14,040.00
A019	Plan / Disclosure Statement	3.1	\$6,045.00
A020	Insurance Adversary Proceeding	173.0	\$183,160.00
		187.2	\$204,510.00

# Exhibit B Summary of Compensation by Professional

		TT 1	Hours	
		Hourly Billing	Billed for	<b>Total Fees</b>
Name of Professional	Position / Year Admitted Practice	Rate	Period	for Period
Scott D. Gilbert	Special Counsel / District of Columbia - 1979	\$1,950	11.3	\$22,035.00
	U.S. Court of Appeals for the District of Columbia – 1980	<b>\$1,500</b>	1110	Ψ==,σσστοσ
	U.S. Court of International Trade - 1984			
	U.S. Supreme Court - 1987			
	U.S. District Court for the District of Columbia – 2008			
	Cherokee Nation - 2017			
	U.S. Court of Federal Claims – 2019			
Richard Shore	Partner / State of New York – 1988	\$1,600	23.0	\$36,800.00
	District of Columbia – 1989			
	U.S. Court of Appeals for the Third Circuit – 2009			
	U.S. Court of Appeals for the Fourth Circuit – 2014			
	U.S. Court of Appeals for the Ninth Circuit – 2014			
	U.S. Court of Appeals for the Fifth Circuit – 2017			
	Cherokee Nation – 2017	<b>* * * * * * * * * *</b>	• • • •	<b>*</b> 40.000.00
Richard Leveridge	Partner / State of New York – 1997	\$1,600	25.0	\$40,000.00
	District of Columbia – 1981			
	U.S. Court of Appeals for the District of Columbia – 1981			
	U.S. District Court for the District of Columbia – 1982			
	U.S. Supreme Court - 1986			
	U.S. Court of Appeals for the Fourth Circuit - 1988 U.S. District Court for the E. D. of New York – 1988			
	U.S. District Court for the E. D. of New York – 1988  U.S. District Court for the S. D. of New York - 1998			
	U.S. District Court for the S. D. of New York - 1998 U.S. District Court for the District of Maryland – 2000			
	U.S. Court of Appeals for the Second Circuit - 2020			
Jason Rubinstein	Partner / State of Maryland – 2006	\$1,000	40.1	\$40,100.00
Jason Kuomstem	District of Columbia – 2007	\$1,000	40.1	\$40,100.00
	U.S. District Court for the District of Maryland – 2007			
	U.S. District Court for the District of Columbia – 2011			
Jon Dougherty	Of Counsel / State of New York – 2014	\$825	54.8	\$45,210.00
Jon Bougherty	U.S. District Court for the S. D. of New York – 2014	Ψ023	3 1.0	ψ13,210.00
	District of Columbia – 2016			
	U.S. District Court for District of Wisconsin – 2017			
	U.S. Bankruptcy Court for the S. D. of New York – 2022			
Alison Gaske	Associate / District of Columbia – 2016	\$725	10.3	\$7,467.50
Sarah Sraders	Associate / State of New York – 2016	\$725	10.0	\$7,250.00
	District of Columbia - 2017			. , = = = =
Janet Sanchez	Associate / State of Maryland – 2020	\$525	9.3	\$4,882.50
	District of Columbia - 2022			<u> </u>
Carmen Turner	Junior Paralegal – Joined firm in 2021	\$225	3.4	\$765.00
	Totals		187.2	\$204,510.00
	Attorney Blended Rate	\$1,108.51		
	Paraprofessional Blended Rate	\$225.00		

# Exhibit C Summary of Expenses Incurred

# SUMMARY OF EXPENSES INCURRED

DESCRIPTION	Total Expenses for Period
Depositions / Transcripts	\$1,652.00
Total	\$1,652.00

# Exhibit D Time and Expense Detail

19-23649-shl Doc 5814 Filed 08/10/23 Entered 08/10/23 14:50:40 Main Document Pg 12 of 21



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GilbertLegal.com

July 19, 2023

Invoice Number: 11330775 Client Number: 1599

Tax ID:

52-2283869

c/o Marshall S. Huebner Davis Polk & Wardwell LLP 450 Lexington Avenue New York, NY 10017

Ad Hoc Committee

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#### FOR PROFESSIONAL SERVICES RENDERED through June 30, 2023

Re: Ad Hoc Committee (Purdue)

Matter Description	Fees	Costs	Total
Purdue Bankruptcy Total	204,510.00 <b>204,510.00</b>	1,652.00 <b>1,652.00</b>	206,162.00 <b>206,162.00</b>
	TOTA	AL FEES	\$ 204,510.00
	TOTAL EXP	PENSES	\$ 1,652.00
	TOTAL FEES AND EXP	PENSES	\$ 206,162.00



### FOR PROFESSIONAL SERVICES RENDERED through June 30, 2023

### **Purdue Bankruptcy**

#### A004: Case Administration

Name	Date	Services	Hours	Amount
Turner, C.	6/05/23	Review court docket for pleadings recently filed in case.	.90	202.50
Turner, C.	6/12/23	Review court docket for pleadings recently filed in case.	.80	180.00
Turner, C.	6/20/23	Review court docket for pleadings recently filed in case.	.90	202.50
Turner, C.	6/26/23	Review court docket for pleadings recently filed in case.	.80	180.00
		Project Total:	3.40	\$ 765.00

### A008: Hearings

Name	Date	Services	Hours	Amount
Rubinstein, J.	6/29/23	Attend preliminary injunction hearing.	.50	500.00
		Project Total:	.50	\$ 500.00

#### A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Gilbert, S.	6/01/23	Attend AHC meeting re strategy.	1.00	1,950.00
Gilbert, S.	6/02/23	Confer with dual working group re Second Circuit decision.	1.10	2,145.00
Gilbert, S.	6/06/23	Attend AHC working group meeting re pending issues and strategy.	.90	1,755.00
Gilbert, S.	6/08/23	Confer with AHC working group re strategy.	.80	1,560.00
Gilbert, S.	6/09/23	Confer with AHC working group re Second Circuit decision.	.90	1,755.00
Gilbert, S.	6/13/23	Attend AHC working group meeting re case status.	.60	1,170.00
Gilbert, S.	6/20/23	Attend AHC working group re strategy.	.60	1,170.00
Gilbert, S.	6/29/23	Attend AHC working group meeting re strategy.	1.30	2,535.00
		Project Total:	7.20	\$ 14,040.00

July 19, 2023

### A019: Plan / Disclosure Statement

Name	Date	Services	Hours	Amount
Gilbert, S.	6/07/23	Confer with Debtors re strategy.	.60	1,170.00
Gilbert, S.	6/09/23	Attend meeting with DOJ re Second Circuit decision.	.60	1,170.00
Gilbert, S.	6/14/23	Confer with S. Birnbaum and M. Kesselman re strategy.	.80	1,560.00
Gilbert, S.	6/29/23	Confer with Debtors re IAC.	1.10	2,145.00
		Project Total:	3.10	\$ 6,045.00

## **A020: Insurance Adversary Proceeding**

Name	Date	Services	Hours	Amount
Gilbert, S.	6/01/23	Analyze insurance litigation strategy.	1.00	1,950.00
Shore, R.	6/01/23	Revise draft of memorandum re Issue #69.	4.10	6,560.00
Shore, R.	6/01/23	Confer with team re litigation update and next steps.	.50	800.00
Shore, R.	6/01/23	Analysis of comments re Issue #69 memorandum.	.40	640.00
Rubinstein, J.	6/01/23	Confer with team re case status and strategy (0.5); review status of pending research projects and issues (0.5); participate in co-plaintiff strategy call (0.9); revise draft communication to insurers re case management proposal (0.3); review correspondence from Consulting Expert A (0.2); revise memorandum to co-counsel re case management (0.7); review correspondence with Court re status conference scheduling (0.2); analysis re Issue #52 (0.8); analysis re Issue #69 (1.0).	5.10	5,100.00
Gaske, A.	6/01/23	Confer with team re case status.	.50	362.50
Gaske, A.	6/01/23	Revise memorandum re status of policy stipulation project.	.60	435.00
Leveridge, R.	6/01/23	Confer with team re litigation status and next steps.	.50	800.00
Leveridge, R.	6/01/23	Confer with co-counsel re status of proceedings (0.9); review communication from opposing counsel and P. Breene re same (0.3); draft response to opposing counsel (0.9).	2.10	3,360.00
Leveridge, R.	6/01/23	Revise memorandum to co-counsel re Issue #69 (0.8); review proposed additional edits to memorandum (0.6).	1.40	2,240.00
Sraders, S.	6/01/23	Confer with team re strategy and next steps.	.50	362.50
Sraders, S.	6/01/23	Revise draft memorandum re Issue #69.	1.70	1,232.50

Name	Date	Services	Hours	Amount
Dougherty, J.	6/01/23	Confer with team re case status and strategy.	.50	412.50
Shore, R.	6/02/23	Confer with J. Rubinstein re status of research projects and other pending matters.	.50	800.00
Shore, R.	6/02/23	Revise memorandum re Issue #69 (2.5); communicate with co-plaintiffs counsel re final version of memorandum (0.6).	3.10	4,960.00
Shore, R.	6/02/23	Review and provide comments to correspondence to insurers re continuation of stay.	.40	640.00
Rubinstein, J.	6/02/23	Review correspondence from co-counsel re Issue #69 (0.3); continue review of draft pleading re same (0.7); review draft pleading from co-counsel re case management options (0.3); review Consulting Expert A update (0.2); update litigation task list (0.4); confer with R. Shore re pending research and other projects (0.5); revise draft correspondence to insurers re status conference (0.6); correspond with co-counsel re same (0.2).	3.20	3,200.00
Leveridge, R.	6/02/23	Begin review of draft response to Issue #69 pleading.	.40	640.00
Leveridge, R.	6/02/23	Communicate with co-counsel re message to insurers re stay.	.90	1,440.00
Leveridge, R.	6/02/23	Review final draft of memorandum to co-counsel re Issue #69.	1.10	1,760.00
Leveridge, R.	6/02/23	Review draft stipulation from co-counsel re schedule (0.2); communicate with co-counsel (P. Breene) re same (0.2).	.40	640.00
Sraders, S.	6/02/23	Revise draft memorandum re Issue #69.	.50	362.50
Shore, R.	6/05/23	Confer with R. Leveridge and J. Rubinstein re correspondence to insurers re standstill in light of Second Circuit ruling.	.60	960.00
Shore, R.	6/05/23	Review draft letter to solicitor general re Second Circuit decision and consider impact on adversary proceeding.	.90	1,440.00
Shore, R.	6/05/23	Analyze A. Crawford response to and questions re memorandum re Issue #69 (0.9); review table comparing adversary issues and Issue #69 (0.8).	1.70	2,720.00
Rubinstein, J.	6/05/23	Revise draft of correspondence to insurers re case management (0.5); review correspondence re potential appeal of Second Circuit ruling re plan (0.5); confer with R. Shore and R. Leveridge re strategy (0.6); revise draft response re Issue #69 (3.1); revise status memorandum re policy stipulations (0.4).	5.10	5,100.00
Leveridge, R.	6/05/23	Review draft pleading re Issue #69 (2.0); communicate with co-counsel re same (0.4).	2.40	3,840.00

Name	Date	Services	Hours	Amount
Leveridge, R.	6/05/23	Confer with R. Shore and J. Rubinstein re communication with insurers.	.60	960.00
Leveridge, R.	6/05/23	Communicate with co-counsel re schedule issue (0.3); review revised correspondence to insurers re same (0.6).	.90	1,440.00
Leveridge, R.	6/05/23	Communicate with Consulting Expert A re status of schedule and projects.	.60	960.00
Sraders, S.	6/05/23	Analyze defenses re Issue #69.	.30	217.50
Shore, R.	6/06/23	Confer with Debtors' counsel, J. Rubinstein, and R. Leveridge re strategy.	.80	1,280.00
Shore, R.	6/06/23	Analyze strategy re Issue #69.	1.10	1,760.00
Rubinstein, J.	6/06/23	Review Issue #69 pleadings (0.2); revise draft response re same (4.2); confer with Debtors' counsel, R. Shore and R. Leveridge re strategy (0.8).	5.20	5,200.00
Gaske, A.	6/06/23	Revise status of policy stipulations memorandum.	.40	290.00
Leveridge, R.	6/06/23	Analyze strategy and next steps re Issue #69.	.90	1,440.00
Leveridge, R.	6/06/23	Confer with co-counsel, R. Shore, and J. Rubinstein re Issue #69.	.80	1,280.00
Sraders, S.	6/06/23	Analyze defenses raised in pleading re Issue #69.	.20	145.00
Dougherty, J.	6/06/23	Review deposition exhibits for motions practice, presentations, and at trial.	3.20	2,640.00
Shore, R.	6/07/23	Confer with co-plaintiffs' counsel re status, strategy, and next steps.	.50	800.00
Shore, R.	6/07/23	Continue analyzing Issue #69 strategy and next steps.	1.40	2,240.00
Shore, R.	6/07/23	Review communication from P. Lewis re Issue #69.	.30	480.00
Rubinstein, J.	6/07/23	Analysis re Issue #69 strategy (0.3); analysis re Issue #14 (0.2); correspond with Consulting Expert A re analysis (0.2); participate in call with cocunsel re strategy (0.5); revise pleading re Issue #69 (3.4).	4.60	4,600.00
Leveridge, R.	6/07/23	Communicate with P. Lewis re Issue #69 (0.5); communicate with co-counsel re issues relating to adversary proceeding and Issue #69 (0.5).	1.00	1,600.00
Leveridge, R.	6/07/23	Communicate with Consulting Expert A re results of analysis.	.40	640.00
Sraders, S.	6/07/23	Analysis re policy language.	.10	72.50
Dougherty, J.	6/07/23	Continue reviewing deposition materials for potential use in future motions practice, presentations, and at trial.	2.80	2,310.00
Rubinstein, J.	6/08/23	Correspond with co-counsel re Issue #69.	.30	300.00

Name	Date	Services	Hours	Amount
Gaske, A.	6/08/23	Revise memorandum re Issue #52.	.90	652.50
Leveridge, R.	6/08/23	Review J. Rubinstein comments on draft pleading provided by co-counsel.	.80	1,280.00
Dougherty, J.	6/08/23	Review deposition exhibits and documents for potential use in future motions.	3.70	3,052.50
Dougherty, J.	6/09/23	Continue review of deposition materials for future motions practice, presentations, and at trial.	1.80	1,485.00
Rubinstein, J.	6/12/23	Communicate with co-counsel re case schedule (0.2); review proposed edits to memorandum re Issue #52 (1.0).	1.20	1,200.00
Sanchez, J.	6/12/23	Summarize Deponent #16 deposition.	1.60	840.00
Dougherty, J.	6/12/23	Review deposition exhibits and materials for future motions practice, presentations, and at trial.	3.50	2,887.50
Rubinstein, J.	6/13/23	Communicate with team re status and next steps of multiple projects.	.90	900.00
Leveridge, R.	6/13/23	Communicate with J. Rubinstein re status of outstanding projects.	.30	480.00
Dougherty, J.	6/13/23	Continue reviewing deposition exhibits for future motions practice, presentations, and at trial.	1.40	1,155.00
Shore, R.	6/14/23	Analysis re Issue #69.	.30	480.00
Rubinstein, J.	6/14/23	Review analysis of recent opioid related judicial decision in other opioid insurance coverage matter (0.1); correspond with co-counsel re communication with insurers re case management (0.2).	.30	300.00
Leveridge, R.	6/14/23	Communicate with co-counsel and opposing counsel re proposed standstill.	.20	320.00
Sraders, S.	6/14/23	Revise memorandum re Issue #52.	2.50	1,812.50
Dougherty, J.	6/14/23	Continue review of deposition exhibits potential use in future motions practice, presentations, and at trial.	3.80	3,135.00
Shore, R.	6/15/23	Participate in call with co-counsel re strategy.	.60	960.00
Shore, R.	6/15/23	Continue analysis re Issue #69.	.50	800.00
Shore, R.	6/15/23	Review memorandum re scheduling issues (0.4); communicate with co-counsel re same (0.2).	.60	960.00
Rubinstein, J.	6/15/23	Participate in call with co-counsel re strategy (0.6); communicate with team re Issue #69 (0.1).	.70	700.00
Gaske, A.	6/15/23	Correspond with J. Rubinstein re Issue #52.	.20	145.00
Leveridge, R.	6/15/23	Communicate with co-counsel re case status and Issue #69 (0.4); review proposed stipulation from insurers (0.6); communicate with co-counsel re same (0.4).	1.40	2,240.00

Name	Date	Services	Hours	Amount
Sraders, S.	6/15/23	Correspond with A. Gaske re memorandum re Issue #52.	.10	72.50
Dougherty, J.	6/15/23	Review deposition exhibits for potential use in future motions practice, presentations, and at trial.	2.90	2,392.50
Shore, R.	6/16/23	Communicate with R. Leveridge and J. Rubinstein re Issue #69 strategy.	.40	640.00
Rubinstein, J.	6/16/23	Review notice re hearing scheduling (0.2); analysis re Issue #69 (0.2); analysis re Issue #52 (0.2); confer with R. Leveridge re proposed case management stipulation (0.5); revise same (0.3); correspond with co-plaintiffs re same (0.2).	1.60	1,600.00
Sanchez, J.	6/16/23	Continue drafting summary of Deponent #16 deposition.	3.20	1,680.00
Leveridge, R.	6/16/23	Communicate with co-counsel (P. Breene) re proposed schedule stipulation from insurers (0.3); review proposed edits to stipulation from J. Rubinstein (0.6).	.90	1,440.00
Leveridge, R.	6/16/23	Communicate with R. Shore and J. Rubinstein re Issue #69.	.40	640.00
Dougherty, J.	6/16/23	Continue reviewing deposition exhibits and materials for potential use in future motions practice, presentations, and at trial.	3.30	2,722.50
Shore, R.	6/18/23	Correspond with co-counsel re Issue #69.	.10	160.00
Gaske, A.	6/18/23	Revise memorandum re Issue #52.	2.80	2,030.00
Sraders, S.	6/18/23	Revise draft memorandum re Issue #52.	2.70	1,957.50
Gaske, A.	6/19/23	Revise memorandum re Issue #52.	1.30	942.50
Shore, R.	6/20/23	Communicate with R. Leveridge re Issue #69.	.40	640.00
Rubinstein, J.	6/20/23	Revise case management stipulation (0.5); confer with A. Gaske re Issue #52 (0.4).	.90	900.00
Sanchez, J.	6/20/23	Continue summarizing Deponent #16 deposition.	3.20	1,680.00
Gaske, A.	6/20/23	Confer with J. Rubinstein re Issue #52.	.40	290.00
Gaske, A.	6/20/23	Review memorandum re Issue #52.	1.30	942.50
Leveridge, R.	6/20/23	Communicate with J. Rubinstein re schedule stipulation (0.3); communicate with R. Shore re Issue #69 (0.1).	.40	640.00
Dougherty, J.	6/20/23	Continue reviewing deposition exhibits and materials for future motions practice, presentations, and at trial.	2.20	1,815.00
Rubinstein, J.	6/21/23	Correspond with co-counsel re subpoenas (0.2); revise stipulation re case management (0.5); review status update from AHC co-counsel (0.1); review updated memorandum re Issue #52 (0.5).	1.30	1,300.00
Gaske, A.	6/21/23	Final revisions to memorandum re Issue #52.	.70	507.50

Name	Date	Services	Hours	Amount
Leveridge, R.	6/21/23	Review proposed stipulation re schedule (0.5); communicate with co-counsel and opposing counsel re same (0.4).	.90	1,440.00
Dougherty, J.	6/21/23	Review deposition exhibits for potential use in future motions practice, presentations, and at trial.	3.80	3,135.00
Shore, R.	6/22/23	Review and provide comments to memorandum re Issue #52.	.80	1,280.00
Rubinstein, J.	6/22/23	Communicate with co-counsel re revised stipulation re case management (0.2); analysis re Consulting Expert A (0.2); participate in call with co-counsel re strategy (0.2); provide comments to memorandum re Issue #52 (0.8).	1.40	1,400.00
Leveridge, R.	6/22/23	Confer with co-counsel re strategy issues.	.30	480.00
Rubinstein, J.	6/23/23	Communicate with co-counsel re Issue #69.	.60	600.00
Rubinstein, J.	6/23/23	Review prior comments to pleading re Issue #69 in preparation for discussion with co-counsel.	1.00	1,000.00
Sanchez, J.	6/23/23	Continue summarizing deposition of Deponent #16.	1.30	682.50
Leveridge, R.	6/23/23	Review communications from co-counsel re scheduling.	.40	640.00
Dougherty, J.	6/23/23	Review deposition exhibits and materials for potential use in future motions practice, presentations, and at trial.	2.40	1,980.00
Shore, R.	6/26/23	Confer with R. Leveridge and J. Rubinstein re status, strategy, and next steps.	.70	1,120.00
Rubinstein, J.	6/26/23	Confer with R. Shore and R. Leveridge re litigation strategy and next steps (0.7); analysis Consulting Expert A (0.2); communicate with co-plaintiffs re Issue #69 (0.3); revise pleading re Issue #69 (2.2); analysis re Issue #52 (0.5).	3.90	3,900.00
Leveridge, R.	6/26/23	Confer with R. Shore and J. Rubinstein re status of adversary proceeding and strategy.	.70	1,120.00
Leveridge, R.	6/26/23	Communicate with co-counsel re schedule stipulation and Issue #69.	.60	960.00
Dougherty, J.	6/26/23	Continue reviewing documents and exhibits for potential use in future motions practice, presentations, and at trial.	2.60	2,145.00
Shore, R.	6/27/23	Review letter re stay stipulation.	.30	480.00
Rubinstein, J.	6/27/23	Confer with co-counsel re draft letter to Court re stay (0.5); correspond with co-counsel re Issue #69 (0.3).	.80	800.00
Gaske, A.	6/27/23	Correspond with S. Sraders re revisions to memorandum on Issue #52.	.50	362.50
Gaske, A.	6/27/23	Correspond with A. Kramer re Issue #52.	.20	145.00

Name	Date	Services	Hours	Amount
Leveridge, R.	6/27/23	Communicate with opposing counsel and co- counsel re communication to Court re schedule.	.90	1,440.00
Sraders, S.	6/27/23	Analyze Issue #52 in light of comments from J. Rubinstein.	.50	362.50
Dougherty, J.	6/27/23	Continue review of deposition exhibits for potential use in future motions practice (2.2); update tracking document re same (1.3).	3.50	2,887.50
Shore, R.	6/28/23	Communicate with R. Leveridge and J. Rubinstein re schedule.	.10	160.00
Rubinstein, J.	6/28/23	Correspond with co-counsel re edits to draft letter to Court re status conference.	.20	200.00
Gaske, A.	6/28/23	Confer with A. Kramer and S. Sraders re Issue #52 (0.3); confer with S. Sraders re Issue #52 (0.2).	.50	362.50
Leveridge, R.	6/28/23	Review communications with co-counsel and opposing counsel re schedule (0.8); review communication from Court re same (0.1).	.90	1,440.00
Sraders, S.	6/28/23	Confer with A. Gaske re analysis of Issue #52.	.20	145.00
Sraders, S.	6/28/23	Confer with A. Kramer and A. Gaske re analysis of Issue #52.	.30	217.50
Sraders, S.	6/28/23	Revise draft memorandum re Issue #52.	.20	145.00
Dougherty, J.	6/28/23	Continue reviewing depositions exhibits for use in future motions practice, presentations, and at trial (2.8); revise tracking document re same (1.4).	4.20	3,465.00
Shore, R.	6/29/23	Review mateirals re Issue #69.	.50	800.00
Shore, R.	6/29/23	Analysis re Judge Lane approval of adversary stay through September and next steps.	1.10	1,760.00
Rubinstein, J.	6/29/23	Communicate with R. Shore and R. Leveridge re Issue #69 (0.2); review draft correspondence re same (0.5); confer with co-counsel re strategy (0.5).	1.20	1,200.00
Leveridge, R.	6/29/23	Review communications from Debtors' counsel re scheduling (0.6); communicate with R. Shore and J. Rubinstein re same (0.3).	.90	1,440.00
Dougherty, J.	6/29/23	Continue reviewing deposition exhibits for potential use in future motions practice, presentations, and at trial (3.1); draft tracking document re same (1.7).	4.80	3,960.00
Shore, R.	6/30/23	Communicate with R. Leveridge and J. Rubinstein re Issue #69.	.30	480.00
Rubinstein, J.	6/30/23	Correspond with J. Dougherty re trial proof project.	.10	100.00
Leveridge, R.	6/30/23	Communicate with Consulting Expert A re schedule status and related matters.	.30	480.00
Leveridge, R.	6/30/23	Communicate with R. Shore and J. Rubinstein re Issue #69.	.30	480.00
Sraders, S.	6/30/23	Revise draft memorandum re Issue #52.	.20	145.00

July 19, 2023

Name	Date	Services	Hours	Amount
Dougherty, J.	6/30/23	Continue review of deposition materials for potential use in future motions practice, presentations, and at trial (1.2); revise tracking document re same (3.2).	4.40	3,630.00
		Project Total:	173.00	\$ 183,160.00
		TOTAL CHARGEABLE HOURS	187.20	
		TOTAL FEES		\$ 204.510.00

#### **TIMEKEEPER SUMMARY**

Timekeeper	Hours	Rate	Total
Gilbert, S.	11.30	1,950.00	22,035.00
Shore, R.	23.00	1,600.00	36,800.00
Rubinstein, J.	40.10	1,000.00	40,100.00
Sanchez, J.	9.30	525.00	4,882.50
Gaske, A.	10.30	725.00	7,467.50
Leveridge, R.	25.00	1,600.00	40,000.00
Sraders, S.	10.00	725.00	7,250.00
Turner, C.	3.40	225.00	765.00
Dougherty, J.	54.80	825.00	45,210.00
TOTALS	187.20		\$ 204,510.00

#### **TASK SUMMARY**

Task	Description	Hours	Amount
A004	Case Administration	3.40	765.00
800A	Hearings	.50	500.00
A009	Meetings / Communications with AHC & Creditors	7.20	14,040.00
A019	Plan / Disclosure Statement	3.10	6,045.00
A020	Insurance Adversary Proceeding	173.00	183,160.00

#### **EXPENSE DETAILS**

## **E115: Deposition Transcripts**

Date	Description	Task	Amount
5/10/23	Depositions / Transcripts - Vertitext / Video Deposition Services / Access - Witness: S. Odarczenko	E115	1,652.00
	Sub-Total of Expenses:		\$ 1,652.00
	TOTAL FEES AND EXPENSES		\$ 206,162.00